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May 26, 2021

**BY ECF**

Honorable Madeline Cox Arleo, *U.S.D.J.*  
United States District Court  
District of New Jersey  
Martin Luther King Building  
& U.S. Courthouse  
Newark, N.J. 07101

**United States of America v. Bakhshi, 2:18-cr-000735-MCA-4  
Request to Amend Motion Schedule**

Hon. Madeline Cox Arleo:

This law firm represents defendant Pavandeep Bakhshi in the above-referenced criminal action. We write in response to the letter filed today by defendant Paul Parmar requesting with the Government's consent an extension of time to file his reply on pre-trial motions from May 27, 2021 to June 10, 2021 [Dkt. 111].

If the Court is inclined to grant the extension (on which Mr. Bakhshi takes no position), we write to respectfully request that the same deadline be applied to Mr. Bakhshi to keep the defendants' replies on their pre-trial motions on the same schedule. The Government consents to Mr. Bakhshi's request herein.

Respectfully submitted,

Squire Patton Boggs (US) LLP

/s/ Franklin G. Monsour, Jr.

Franklin G. Monsour, Jr.

cc: counsel of record (via ECF)